

MEMO ENDORSED



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
*Corporation Counsel*

MARK D. ZUCKERMAN  
Senior Counsel  
E-mail: mzuckerm@law.nyc.gov  
Phone: (212) 356-3519  
Fax: (212) 788-9776

November 24, 2020

**VIA ECF**

The Honorable Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: Julian Cepeda, et. al. v. City of New York, et. al., 20 CV 3483 (CM)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, DOC Comm. Cynthia Brann, Brian Sullivan and Edward Williams in the above-referenced matter. We write with the consent of all counsel to respectfully request that the settlement conference scheduled for December 11, 2020, at 2:30 p.m. be adjourned for a period of forty five days. The reason for the request is that during the City's settlement authority process, the need for plaintiffs' pertinent medical records while incarcerated at Albany has arisen. Although we were able to obtain the medical records quickly upon request in Washington v. City of New York, et. al., 18 CV 12306 (CM), which as the Court is aware involved similar allegations, and thought I could obtain them quickly herein, I have been informed that our office doesn't have medical releases from plaintiffs, nor do plaintiffs' counsel have releases that would allow such medical records to be provided to us quickly. Since the Albany defendants are requiring such releases (correctly), and nine plaintiffs are incarcerated, it will take some time for the releases to be obtained.

The City defendants respectfully suggest that a telephonic scheduling conference might be useful during the week of December 7, 2020.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman

Mark D. Zuckerman  
Senior Counsel

cc: All Counsel (via ECF)

**SO ORDERED:**

Application GRANTED. Conference is rescheduled  
to February 2, 2021 at 2:30 p.m.



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**Ona T. Wang** 12/2/20  
United States Magistrate Judge